



October 24, 2017

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RETURN RECEIPT REQUESTED

Chief, Environmental Enforcement Section
Environment and Natural Resources Division
U.S. Department of Justice
Box 7611 Ben Franklin Station
Washington, D.C. 20044-7611
Re: DOJ No. 90-5-2-1-10459

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RETURN RECEIPT REQUESTED

Director, Air Enforcement Division
Office of Civil Enforcement
U.S. EPA Headquarters, MC 2242A
1200 Pennsylvania Ave., NW
Washington, D.C. 20460

CERTIFIED MAIL: 7013 0600 0000 5877 6831

RETURN RECEIPT REQUESTED

Chief, Air and TRI Section
Enforcement Division
U.S. Environmental Protection Agency
Region 9
75 Hawthorne Street
San Francisco, CA 94105

RE: Consent Decree No. CV-15-02206-PHX-DLR – Notification of Emission Limit Exceedance

To whom it may concern:


A Reference Test Method 5 particulate test was conducted on the RR Cottrell Electrostatic Precipitator (ESP) on Sept 19, 2017. Asarco received the results of the test on October 23, 2017. The summary of the test results is attached. The 3-run average was 26.09 mg/dscm, above the 23 mg/dscm provided for in the Consent Decree (Paragraph 19). As explained below, Asarco believes that the test results are erroneous because of the likelihood of sampling error and Asarco has scheduled a retest for the week of November 6, 2017.

Prior Method 5 testing shows that the RR Cottrell's particulate averages about half the standard or less. The continuous opacity measurement on the RR Cottrell ESP was during the test periods normal (see attached). Such results ordinarily would not indicate the existence of a high particulate condition.

In an attempt to verify the performance test results Asarco requested that its testing contractor check their test parameters and calculations for this performance test. Asarco notes that this location is very difficult to sample as it is composed of a hundred year old 20' x 20' square brick flue, and it is very likely that sample error could have been introduced. It is worth noting in this regard that the RR Cottrell ESP will be replaced with a baghouse prior to May 1, 2018 according to Paragraph 13.

Asarco has also scheduled a retest for the week of November 6, 2017. The repeat testing will occur within the 365 days of the Effective Date as provided in Paragraph 19.

If there are any questions please contact Amy Veek at (520) 356-3296.


for JAW
Joseph A. Wilhelm
General Manager
Hayden Operations

JAW/rcg

Attachments

pc: S. Gasser, w/o enc.
A. Veek, w/enc.
SM Engineer, "

Summary of ASARCO LLC Hayden Operations

Particulate/SO₂ & H₂SO₄/SO₃ Emission Data

R & R Cottrell

09/19/17

		EPA Method 6 SO ₂		EPA Method 5b Particulates		
Run	Time	ppmvd	lb/hr	gr/dscf	lb/hr	mg/dscm*
10-PT/SO ₂	09:30-11:00	36.1	100.00	0.0115	27.38	26.316
11-PT/SO ₂	11:52-13:25	83.0	267.41	0.0138	38.20	31.579
12-PT/SO ₂	14:30-16:05	83.0	256.35	0.0089	23.62	20.366
Mean		67.4	207.92	0.0114	29.73	26.09

		EPA Method 8 H ₂ SO ₄		EPA Method 8 SO ₃	
Run	Time	ppmvd	lb/hr	ppmvd	lb/hr
1-H ₂ SO ₄ /SO ₃	09:30-11:00	1.5	6.17	1.5	5.03
11-H ₂ SO ₄ /SO ₃	11:52-13:25	2.2	10.89	2.2	8.90
12-H ₂ SO ₄ /SO ₃	14:30-16:05	1.9	9.00	1.9	7.36
Mean		1.9	8.69	1.9	7.10

EPA Methods 1-4 Gas Stream Characteristics								
Run	Time	AWCFM	ADCFM	DSCFH	Ts °F	H ₂ O	CO ₂	O ₂
						%v	%vd	
10-PT/SO ₂	09:30-11:00	347,519.8	331,082.1	16,666,847.9	121.8	4.73	0.00	20.90
11-PT/SO ₂	11:52-13:25	421,303.7	397,500.0	19,377,542.3	140.8	5.65	0.00	20.90
12-PT/SO ₂	14:30-16:05	407,260.2	383,476.2	18,576,409.0	144.6	5.84	0.00	20.90
Mean		392,027.9	370,686.1	18,206,933.1	135.7	5.41	0.00	20.90

Example Calculation from Run 1-PT/SO₂:

$$\begin{aligned}
 *mg/dscm &= 2,288.35 * gr/dscf \\
 &= .00115 * 2288.35 \\
 &= 26.316
 \end{aligned}$$

Run #1 - 10-PT/SO2

date	time	of_unt	of
9/19/2017	09:30	PCT	3.353
9/19/2017	09:36	PCT	3.217
9/19/2017	09:42	PCT	3.11
9/19/2017	09:48	PCT	3.461
9/19/2017	09:54	PCT	3.268
9/19/2017	10:00	PCT	3.01
9/19/2017	10:06	PCT	2.92
9/19/2017	10:12	PCT	2.934
9/19/2017	10:18	PCT	2.963
9/19/2017	10:24	PCT	2.896
9/19/2017	10:30	PCT	2.973
9/19/2017	10:36	PCT	2.986
9/19/2017	10:42	PCT	3.157
9/19/2017	10:48	PCT	3.359
9/19/2017	10:54	PCT	3.063
9/19/2017	11:00	PCT	3.145

Run #2 - 11-PT/SO2

date	time	of_unt	of
9/19/2017	11:54	PCT	3.063
9/19/2017	12:00	PCT	3.016
9/19/2017	12:06	PCT	3.248
9/19/2017	12:12	PCT	3.387
9/19/2017	12:18	PCT	3.873
9/19/2017	12:24	PCT	4.722
9/19/2017	12:30	PCT	3.691
9/19/2017	12:36	PCT	3.17
9/19/2017	12:42	PCT	3.317
9/19/2017	12:48	PCT	3.48
9/19/2017	12:54	PCT	4.636
9/19/2017	13:00	PCT	4.131
9/19/2017	13:06	PCT	3.414
9/19/2017	13:12	PCT	3.046
9/19/2017	13:18	PCT	3.038
9/19/2017	13:24	PCT	3.723
9/19/2017	13:30	PCT	3.99

Run #3 - 12-PT/SO2

date	time	of_unt	of
9/19/2017	14:30	PCT	3.07
9/19/2017	14:36	PCT	3.044
9/19/2017	14:42	PCT	3.043
9/19/2017	14:48	PCT	3.163
9/19/2017	14:54	PCT	3.456
9/19/2017	15:00	PCT	3.621
9/19/2017	15:06	PCT	3.123
9/19/2017	15:12	PCT	3.673
9/19/2017	15:18	PCT	4.921
9/19/2017	15:24	PCT	4.294
9/19/2017	15:30	PCT	3.717
9/19/2017	15:36	PCT	4.099
9/19/2017	15:42	PCT	4.09
9/19/2017	15:48	PCT	4.85
9/19/2017	15:54	PCT	4.174
9/19/2017	16:00	PCT	3.647
9/19/2017	16:06	PCT	3.163